= SMITH HAUGHEY RICE & ROEGGE, A Professional Corporation

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

LELAND FOSTER.

Plaintiff,

CASE NO. 2:18-CV-10545-SFC-RSW

V

HON. SEAN F. COX

CROSSROADS SHOPPING CENTER
INVESTMENTS, LLC, a Delaware Limited Liability
Company,
STIPULATION GRANTING DEFE
FAMILY FARM & HOME, INC.'S
MOTION TO COMPEL

Defendant/Cross-Defendant,

and

STIPULATION GRANTING DEFENDANT, FAMILY FARM & HOME, INC.'S MOTION TO COMPEL DEFENDANT/CROSS-DEFENDANT, CROSSROADS SHOPPING CENTER INVESTMENTS, LLC'S ANSWERS TO OUTSTANDING INTERROGATORIES AND TO PRODUCE DOCUMENTS

BIG LOTS STORES, INC., an Ohio Corporation for Profit,

Defendant.

and

FAMILY FARM & HOME, INC., a Michigan Corporation

Defendant/Cross-Claimant,

Owen B. Dunn, Jr. (P66315) Valerie J. Fatica (0083812) Law Office of Owen B. Dunn, Jr. Attorneys for Leland Foster The Ottawa Hills Shopping Center dunnlawoffice@sbcglobal.net; valeriefatica@gmail.com 4334 W. Central Ave., Ste 222 Toledo, OH 43615 419-241-9661 Kevin B. Even (P38599) SMITH HAUGHEY RICE & ROEGGE Attorneys for Family Farm & Home, Inc. keven@shrr.com 900 Third St., Ste 204 Muskegon, MI 49440 231-724-4320

John W. Henke, III (P39294) Law Offices of John W. Henke, III Attorneys for Crossroads Shopping Center Investments, LLC jwhenke@aol.com 29800 Telegraph Rd. Southfield, MI 48034 248-353-6500

John J. Schutza (P26338)
Stacey J. McDaniel (P77672)
Merry, Farnen & Ryan PC
Attorneys for Family Farm & Home, Inc.

Jschutza@mfr-lw.com; smcdaniel@mfr-law.com
300 Maple Park Blvd., Ste 301
St. Clair Shores, MI 48081
586-541-0114

STIPULATION GRANTING DEFENDANT, FAMILY FARM & HOME, INC.'S MOTION TO COMPEL DEFENDANT/CROSS-DEFENDANT, CROSSROADS SHOPPING CENTER INVESTMENTS, LLC'S ANSWERS TO OUTSTANDING INTERROGATORIES AND TO PRODUCE DOCUMENTS

NOW COME Defendant/Cross-Claimant, Family Farm & Home, Inc., and Defendant/Cross-Defendant, Crossroads Shopping Center Investments, LLC, by and through their respective attorneys, and hereby stipulate to the entry of an order GRANTING Defendant/Cross-Claimant, Family Farm & Home, Inc.'s motion to compel discovery pursuant to Fed R Civ P 37(a), and agree as follows:

- 1. On or about September 17, 2018, Defendant, Family Farm & Home, Inc., served on Defendant/Cross-Defendant, Crossroads Shopping Center Investments, LLC its First Set of Interrogatories in writing pursuant to Fed. R. Civ. P. 33.
- 2. On or about September 17, 2018, Defendant, Family Farm & Home, Inc., served on Defendant/Cross-Defendant, Crossroads Shopping Center Investments, LLC its First Request for Production of Documents in writing pursuant to Fed. R. Civ. P. 34.
- 3. To date Defendant/Cross-Defendant, Crossroads Shopping Center Investments, LLC has failed to timely answer or respond to the aforementioned discovery requests.
- 4. The Parties agree that Defendant/Cross-Defendant, Crossroads Shopping Center Investments, LLC shall submit full and complete answers and responses to the aforementioned discovery requests within fifteen (15) days of the entry of this order.

Dated: December 4, 2018 /s/ Kevin B. Even

Kevin B. Even (P38599)

SMITH HAUGHEY RICE & ROEGGE Attorneys for Family Farm & Home, Inc.

keven@shrr.com 900 Third St., Ste 204 Muskegon, MI 49440 231-724-4320

Dated: December 4, 2018 /s/ John W. Henke, III

John W. Henke, III (P39294)

Law Offices of John W. Henke, III

Attorneys for Crossroads Shopping Center

Investments, LLC jwhenke@aol.com 29800 Telegraph Rd. Southfield, MI 48034 248-353-6500